

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|  |   |                         |
|--|---|-------------------------|
| PARKER PELHAM, Individually and on Behalf of | ) |                         |
| All Other Similarly Situated,                | ) |                         |
|  | ) |                         |
| Plaintiff,                                   | ) | C.A. No. 23-162-CFC-SRF |
|  | ) |                         |
| v.   | ) |                         |
|  | ) |                         |
| VBIT TECHNOLOGIES CORP., VBIT MINING         | ) |                         |
| LLC, ADVANCED MINING GROUP, DANH             | ) |                         |
| CONG VO a/k/a DON VO, PHUONG D VO a/k/a      | ) |                         |
| KATIE VO, SEAN TU, JIN GAO, LILLIAN          | ) |                         |
| ZHAO, and JOHN DOE INDIVIDUALS 1-10, and     | ) |                         |
| DOE COMPANIES 1-10,                          | ) |                         |
|  | ) |                         |
| Defendants.                                  | ) |                         |

**MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(5) and 12(b)(6), Defendant Phuong D Vo a/k/a Katie Vo hereby moves to dismiss the Class Action Complaint for Violation of the Federal Securities Laws (D.I. 1).

The grounds for this motion are set forth in Defendant Phuong D. Vo a/k/a Katie Vo's Opening Brief in Support of Her Motion to Dismiss, filed contemporaneously herewith.

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Katie Vo*

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